

MICHAEL O. LEAVITT  
*Governor*

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*Lieutenant Governor*

October 7, 2003

Dave Shaver, Manager of Technical Services  
Genwal Resources Inc.  
P. O. Box 1077  
Price, Utah 84501

Subject: Determination of Administrative Completeness for The South Crandall Lease Application, Genwal Resources Inc., Crandall Canyon Mine, C/015/0032, Task ID #1698, Outgoing File

Dear Mr. Shaver:

The Division has completed a review of the information you submitted on September 16, 2003. This application is considered to be administratively complete. A copy of our review worksheet is enclosed for your information and records.

A technical review of your plan has been initiated. Technical deficiencies will be forwarded to you as reviews are completed. The Division will also coordinate with other agencies and incorporate their comments into our review process. Issues raised will need to be resolved prior to permit issuance.

At this time you should publish a Notice of Complete Application for adding The Crandall Canyon South Lease to the Crandall Canyon Mine as required by R645-300-121. A copy of the publication should be sent to the Division as soon as it is available. You should also insure that a copy of the application is on file at the appropriate County Courthouse. The Division will complete a technical analysis, which must find that your application is technically complete. We anticipate that additional information may be necessary to make your application technically complete and look forward to working with you throughout the permitting process. Please call if you have any questions.

Thank you for your help in the permitting process.

Sincerely,

Daron R. Haddock, Permit Supervisor  
Coal Program  
Utah Division of Oil, Gas & Mining

an  
Enclosure  
cc: Price Field Office  
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**ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET  
(R645-100)**

**APPLICATION DESCRIPTION:** South Crandall Lease Addition

**DATE:** September 19, 2003

**REVIEWER(S):** Karl Houskeeper, Steve Fluke, Jim Smith, Wayne Western, Joe Helfrich

**APPLICANT:** Genwal Resources Inc.

**MINE NAME:** Crandall Canyon **FILE NO.:** C/015/0032 **TASK ID** #1698

**"Administratively Complete Application"** means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

**Directions:** The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

Comments		
301-112	Identification of Interests <u>X</u>	
100	Applicant's Business Structure <u>X</u>	
210	Applicant's Name/Address/Phone <u>X</u>	Phone number needs to be updated from 564 prefix to a 888 prefix.
220	Resident Agent's Name/Address/Phone <u>X</u>	Phone number needs to be updated from 564 prefix to a 888 prefix.
230	Name/Address/Phone of AML Fees Payer <u>X</u>	
300	Corporate Structure & Ownership <u>X</u>	
400	Identify Other Mining Operations in US <u>X</u>	Page 1-7 (not included in application) needs to be updated. Reference to IPA in the reclamation of the Horse Canyon Mine. IPA is no longer associated with the Horse Canyon Mine.
500	Surface & Mineral Ownership <u>X</u>	
600	Ownership Contiguous to Permit <u>X</u>	
700	MSHA Numbers <u>X</u>	

800	Interest in Contiguous Lands	<u>X</u>	
301-113	Violation Information	<u>X</u>	Information in application does not contain the three (3) previous years of violation history. Violation history is present in appendix 1-11 of the existing permit. This information was last updated in 1993.
100	Suspension or Revocation Information	<u>X</u>	
300	List of Violations - <b>3 Previous Years</b>	<u>X</u>	Information in application does not contain the three (3) previous years of violation history. Violation history is present in appendix 1-11 of the existing permit. This information was last updated in 1993.
301-114	Right of Entry	<u>X</u>	Revised pages 1-10 & 1-11 not included in the submittal. Information on these pages needs to be updated to show the new permit area.
301-115	Status of Unsuitability Claims	<u>X</u>	
301-116	Permit Term	<u>X</u>	
301-117	Insurance	<u>X</u>	Draft for Significant Permit Revision for publication was not submitted with the application. Proof of publication for the Significant Permit Revision will be filed with the Division no later than (4) weeks after the last publication.
	Proof of Publication	<u>X</u>	
	Facilities and Structures Used in Common	<u>X</u>	
301-118	Filing Fee	<u>X</u>	Not required for this type of permitting.

301-123	Notarized Signature of Responsible Official —	The C1 & C2 forms for the application were notarized. Page 1-16 of the existing Mining and Reclamation Plan needs to be updated and notarized to indicate that the newly submitted information in the Significant Permit Revision is correct and accurate to the best of the persons signature contained on such page.
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301-130	Information Collection: <u>X</u> <b>Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data</b>	
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301-200	Soils <u>X</u>	The application is intended to extend the underground workings of the mine. No additional surface is planned. Therefor no soils information is required.
211	Description of Pre-mining Soil Resources <u>NA</u>	
221	Prime Farmland Investigation <u>NA</u>	
222	Soil Survey <u>NA</u>	
224	Substitute Topsoil Info (When Proposed) <u>NA</u>	
230	Operation Plan <b>Topsoil Handling/Removal/Storage</b> <u>NA</u>	
240	Reclamation Plan <b>Soil Redistribution/Stabilization</b> <u>NA</u>	

301-300	Biology <u>X</u>	The Biology section is provided for in chapter three of the application and MRP.
320	Vegetation Information <u>X</u>	Fish and Wildlife information is provided for in chapter three section 3.2 of the MRP. Updates in this application include 2003 raptor surveys, wildlife and vegetation information.

322	Fish and Wildlife Information <u>X</u>	Fish and Wildlife information is provided for in chapter three section 3.2 of the MRP. Updates in this application include 2003 raptor surveys, wildlife and vegetation information.
323	Maps/Photos <b>Vegetation-Fish-Wildlife Areas</b> <u>X</u>	A 2003 raptor survey is included in the application. Plates 3-1 and 3-2 contain the regional wildlife and vegetation information.
330	Operation Plan <b>Vegetation-Fish-Wildlife Protection</b> <u>X</u>	The acquisition and mining of the south lease will not result in any additional surface disturbance, therefor the application does not provide for or discuss any changes to the current operation plan. The current plan does include a subsidence monitoring and mitigation plan for the surface above the mined areas. The plan is provided for in section 3.30 of the MRP.
341	Reclamation Plan for Revegetation <u>X</u>	The acquisition and mining of the south lease will not result in any additional surface disturbance, therefor the application does not provide for or discuss any changes to the current reclamation plan. The current plan does include a subsidence monitoring and mitigation plan for the surface above the mined areas. The plan is provided for in section 3.30-3.40 of the MRP.
342	Fish & Wildlife Plan for Reclamation Phase <u>X</u>	The acquisition and mining of the south lease will not result in any additional surface disturbance, therefor the application does not provide for or discuss any changes to the current Fish and Wildlife portion of thereclamation plan. The plan is provided for in section 3.30-3.40 of the MRP.

301-400	Land Use and Air Quality <u>X</u>	
411	Pre-Mining Land Use Information <b>(Includes Cultural Resources)</b> <u>X</u>	The application indicates that a letter from SHPO showing no significant resources exist in the South Crandall Tract is contained in Appendix 4-9. No letter from SHPO is contained in Appendix 4-9 of the application. SHPO is supposed to provide this letter to the Division directly.
412	Post-Mining Land Use Information <u>X</u>	

301-500	Engineering <u>X</u>	Genral engineering plans has been given.
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510 520	General Description of Operation Plan <b>(Maps, Locations, Cross-Sections, Narrative, Descriptions &amp; Calculations)</b>	<u>X</u>	Maps of the new permit area and the proposed coal mine were submitted.
522	Coal Recovery Description	<u>X</u>	The R2P2 was updated.
523	Mining Methods	<u>X</u>	Longwall mining will be used where possible.
524	Blasting and Explosives Plan	<u>X</u>	No blasting is anticipated.
525	Subsidence Control Plan	<u>X</u>	An update plan is included.
526	Mine Facilities Description <b>(Narrative, Plans, Maps) Including Existing Structures &amp; Support Facilities</b>	<u>X</u>	No new surface facilities will be constructed.
527	Transportation Facilities <b>(Including Plans &amp; Maps)</b>	<u>X</u>	No new transportation facilities will be constructed.
528	Coal Mine Waste Plans <b>(Description &amp; Designs)</b>	<u>X</u>	No additional facilities for handling coal mine waste are needed.
529	Management of Mine Openings <b>(Design)</b>	<u>X</u>	No new mine openings are proposed.
531	General Plans for Structures	<u>X</u>	No new structures are anticipated.
532	Sediment Control	<u>X</u>	No new sediment control measures are needed.
533	Impoundments	<u>X</u>	No new impoundments are needed.

301-534	Roads <b>(Plans, Drawings, Designs, &amp; Specifications)</b>	<u>X</u>	No new roads are proposed.
535	Spoil	<u>X</u>	No spoil will be generated from the new area.
536	Coal Mine Waste	<u>X</u>	No changes to how coal mine waste is handled.
537	Regraded Slopes	<u>X</u>	No slopes in the new area will have to be regraded.
540 541-542	Reclamation Narrative, Maps and Plans	<u>X</u>	No new reclamation maps are needed.

551	Casing and Sealing <b>Underground Openings</b>	X	No change to the approved plan
553	Backfilling and Grading Description	<u>X</u>	No new backfilling or grading will be required.

301-600	Geology	<u>X</u>	There is geologic information for the permit and adjacent areas in the current MRP; however, geologic information for the South Crandall Canyon tract is not sufficient to complete the Technical Analysis of the proposed amendment or to update the CHIA. Some of this needed information may be in the appendices that were submitted as part of the amendment, but the MRP needs to incorporate or clearly reference information that addresses the requirements of the Coal Mining Rules.
621	Description of Geology <b>(Permit &amp; Adjacent Area)</b>	<u>X</u>	The Permittee needs to provide the estimated production tonnage for the Blind Canyon Seam. The Permittee needs to provide analyses for acid- and toxic-forming characteristics for the Blind Canyon coal and over- and underburden. The Permittee needs to provide test-boring or drill-log information and show the locations of the boreholes on a map. The Permittee needs to provide engineering properties of roof and floor rock for the Blind Canyon Seam. The Permittee needs to provide sufficient geologic information - including but not limited to the thickness coal seams, overburden, and interburden - to evaluate the subsidence control plan. The Permittee needs to identify the occurrence of subsurface water or aquifers in the South Crandall Canyon tract. The Permittee needs to provide information on how geology may affect the occurrence, availability, movement, quantity and quality of potentially impacted surface and ground water in the South Crandall Canyon tract and adjacent areas. The geologic and hydrologic information submitted is insufficient for the Division to update the CHIA.
622	Geologic Cross-Sections, Maps, and Plans	<u>X</u>	All the Chapter 6 maps need to be updated to include the South Crandall Canyon tract. The Bear Canyon Seam isopach (Plate 6-5), Blind Canyon Seam isopach (Plate 6-4), and the Hiawatha isopach (Plate 6-3) need to include the South Crandall Canyon tract. Blind Canyon overburden and Blind Canyon to Hiawatha interburden map need to be added. Maps need to show the locations of test borings in the South Crandall Canyon tract. Map 6-2 in particular needs to include subsidence projections for the South Crandall Canyon tract.

630	Plans for Casing and Sealing Holes <u>X</u>	These plans are covered in the current MRP, but locations of the holes in the South Crandall Canyon tract are unknown.
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301-700	Hydrology <u>X</u>	Most of the information has been updated to include the South Crandall Lease. Items found deficient are listed below.
721	Description of Hydrologic Resources <u>X</u> <b>(Permit and Adjacent Area)</b>	The description of the existing hydrologic resources within the proposed permit and adjacent areas is updated and appears adequate for review.
722	Cross-Sections and Maps <u>X</u> <b>Subsurface Water - Surface Water - Monitoring Stations - Wells</b>	The South Crandall Lease area needs to be included on the Seep and Spring Locations Map (Plate 7-12), the Potentiometric Surface of Spring Canyon Member, Star Point Formation Map (Plate 7-13), the Groundwater Rights Map (Plate 7-14), the Surface Water Rights Map (Plate 7-15), and the Stream Monitoring Stations Map (Plate 7-16).
723	Sampling and Analysis <u>X</u>	Sampling and analysis of waters within the proposed permit and adjacent areas are included in the ammendment.
724	Baseline Information <u>X</u> <b>Ground Water - Surface Water - Geology - Climatological &amp; Supplemental; If Needed</b>	Hydrologic baseline information has been updated to include the South Crandall Lease.
728	PHC Determination <u>X</u>	The PHC Determination (Appendix 7-15) has been updated to include the South Crandall Lease.
730	General Operation Plan <u>X</u> <b>Minimize Disturbance to Hydrologic Balance &amp; Compliance with Clean Water Act</b>	The nature of the geology, hydrology and mining practices are generally unchanged from those described in the existing MRP. The primary update to reflect the South Crandall Lease centers on the Little Bear Spring located adjacent to the lease area. Findings regarding potential impacts to the spring are outlined in the PHC from studies presented as Appendices 7-52 through 7-62.
731	Ground and Surface Water Protection <u>X</u>	In Section 7.27 - Alternative Water Source Information, the Applicant commits to mitigation for potential disruption to Little Bear Spring through the construction of a water treatment plant. The plant is to be constructed under the provisions of a water replacement agreement between GENWAL Resources, Inc. and the Castle Valley Special Service District. A copy of the agreement is not included in Appendix 7-51 as stated.



732	Ground and Surface Water Monitoring	<u>X</u>	The groundwater and surface water monitoring plan has been updated to include the South Crandall Lease. A table presenting the groundwater and surface water monitoring stations listing the monitoring parameters for each station is requested.
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301-740	Plans and Designs	<u>X</u>	Existing plans and designs are adequate as no new surface disturbance or discharge points are proposed.  No alterations of existing or construction of new siltation structures are needed.  No alterations to the existing sediment pond is needed.  No additional diversion points are needed.  No additional treatment facilities are needed.  No alterations to impoundments are needed.  No alterations to impoundments are needed.  No alterations to discharge structures are needed.  No changes to the disposal of excess spoil are needed.  No changes to handling of coal mine waste are needed.  No changes to the disposal of non-coal mine waste are needed.  No changes to the casing and sealing of wells are needed.
	<b>Operation and Reclamation Plan</b>		
	<b>Sediment Control Measures</b>		
	Siltation Structures	<u>X</u>	
	Sediment Ponds	<u>X</u>	
	Other Treatment Facilities	<u>X</u>	
	Diversions	<u>X</u>	
	Road Drainage	<u>X</u>	
	Impoundments	<u>X</u>	
	Discharge Structures	<u>X</u>	
	Disposal of Excess Spoil	<u>X</u>	
	Coal Mine Waste	<u>X</u>	
	Disposal of Non-Coal Mine Waste	<u>X</u>	
	Casing and Sealing of Wells	<u>X</u>	

301-800	Bonding and Insurance	<u>X</u>	No additional bond or insurance is required.
820	Applicant <b>Have Adequate Bond at Permit Issuance</b>	<u>X</u>	The Permittee has adequate bond
830	Bond Estimate and Calculations Provided	<u>X</u>	No additional bond is needed because all new activities will be underground.
890	Certificate of Insurance Provided	<u>X</u>	No new insurance is needed.

302-200	Special Categories of Mining	<u>X</u>	No special categories of mining are proposed with this application.
210	Experimental Practices Mining	<u>NA</u>	
220	Mountaintop Removal Mining	<u>NA</u>	
230	Steep Slope Mining	<u>NA</u>	
240	Auger Mining	<u>NA</u>	
250	In Situ Processing Activities	<u>NA</u>	

302-260	Coal Processing Plants ( <b>Not Located Within Permit Area of Mine</b> )	<u>X</u>	No coal processing plants are proposed with this application.
270	Variances From Approximate Original Contour Restoration Requirements	<u>NA</u>	
280	Variances for Delay in Contemporaneous Reclamation Requirement in Combined Surface and Underground Coal Mining Activities	<u>NA</u>	
290	Small Operator Assistance Program ( <b>SOAP</b> )	<u>NA</u>	

302-300	Special Areas of Mining	<u>X</u>	No special areas of mining are proposed with this application.
301	Prime Farmland	<u>NA</u>	
302	Alluvial Valley Floors	<u>NA</u>	

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